UNITED STATES BANKR SOUTHERN DISTRICT OF		T	
In re	· .	_ ) ) )	Chapter 11
DELPHI CORPORATION, e	t al.,	)	Case No. 05-44481 (RDD)
Debtors	5.	)	(Jointly Administered)
AFFIDAVIT OF LI	EGAL ORDINA	RY COU	RSE PROFESSIONAL
STATE OF ILLINOIS COUNTY OF COOK	) ) ss )		

- Eric P. Schoonveld, being duly sworn, deposes and says:
- 1. I am a principal of Hall Prangle & Schoonveld, LLC ("Hall Prangle") which firm maintains offices at 200 South Wacker Drive, Suite 3300, Chicago, Illinois 60606.
- 2. Neither I, Hall Prangle, nor any partner, auditor or other member thereof, insofar as I have been able to ascertain, has any connection with the above-captioned debtors and debtors-in-possession (the "Debtors"), their creditors, or any other party-in-interest, or their attorneys, except as set forth in this affidavit.
- 3. Hall Prangle has represented and advised the Debtors in providing legal service with respect to defense of certain litigation matters of the Debtors' businesses.
- 4. The Debtors have requested, and Hall Prangle has agreed, to continue to represent and advise the Debtors pursuant to Section 327(e) of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as amended (the "Bankruptcy Code"), with respect to such matters. Additionally, the Debtors have requested, and Hall Prangle proposes, to render the following services to the Debtors: legal services.
  - 5. Hall Prangle's current fees arrangement is: see attached fee sheet.
- 6. Except as set forth herein, no promises have been received by Hall Prangle or any partner, auditor or other member thereof as to compensation in connection with these chapter 11 cases other than in accordance with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules, orders of this Court, and the Fee Guidelines promulgated by the Executive Office of the United States Trustee.

## 05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 2 of 13

- 7. Hall Prangle has no agreement with any entity to share with such entity any compensation received by Hall Prangle.
- 8. Hall Prangle and its partners, auditors, and other members may have in the past represented, currently represent, and may in the future represent entities that are claimants of the Debtors in matters totally unrelated to these pending chapter 11 cases. Hall Prangle does not and will not represent any such entity in connection with these pending chapter 11 cases and does not have any relationship with any such entity, attorneys, or accountants that would be adverse to the Debtors or their estates.
- 9. Neither I, Hall Prangle, nor any partner, auditor or other member thereof, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors, or their estates in the matters upon which Hall Prangle is to be engaged.
- 10. The foregoing constitutes the statement of Hall Prangle pursuant to sections 329 and 504 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016(b).

FURTHER AFFIANT SAYETH NOT

ERIC P. SCHOONVELD

Subscribed and sworn before me this 9th day of September, 2009.

Xotary Public

"OFFICIAL SEAL"
STEPHANIE A. SNOW
Notary Public, State of Illinois
My Commission Expires 06/16/12

#### **CERTIFICATE OF SERVICE**

Eric P. Schoonveld hereby certifies that on September 10, 2009, served a copy of the Affidavit of Legal Ordinary Counsel Professional, upon the following interested parties via first class mail:

Delphi Corporation Attention: General Counsel 5725 Delphi Drive Troy, Michigan 48098

Skadden Arps Slate Meagher & Flom Attention: John Butler, Esq. 333 West Wacker Drive Suite 2100 Chicago, Illinois 60606

United States Trustee Attention: Alicia Leonhard, Esq. 33 Whitehall Street Suite 2100 New York, New York 10044

Delphi Corporation
Attention: John Sheehan, Esq.
Vice President & Chief Restructuring
Officer
5725 Delphi Drive
Troy, Michigan 48098

Dated: September 10, 2009

Latham & Watkins Attention: Mark Broude, Esq. 885 Third Avenue New York, New York 10022

Simpson Thacher & Bartlett LLP Attention: Marissa Wesley, Esq. 425 Lexington Avenue New York, New York 10017

Davis Polk & Wardwell Attention: Donald Bernstein Esq. 450 Lexington Avenue New York, New York 10017

GE Plastics, Americas Attention: Valeria Venable Credit Manager 9930 Kincey Avenue Huntersville, North Carolina 28078

ERIC P. SCHOONVELD

Subscribed and sworn before me this 10<sup>th</sup> day of September, 2009.

Nøtary Public

"OFFICIAL SEAL"
STEPHANIE A. SNOW
Notary Public, State of Illinois
My Commission Expires 06/16/12

05-44481-rdd Doc 189**39alFited 09/25/09 SEntered 09/26**/09 15:33:04 Main Document Pg 4 of 13 Fee Schedule Master List

 Report ID: ML1150 - 23114
 Printed By MAW

 Vednesday, September 09, 2009
 Page 1

 Dode
 Description

 Timekeeper Rates
 Burke, Thomas J. \$295.00

 Stevens, Jane A.
 \$195.00

\*\*\* End Of Report \*\*\*

#### 

200 South Wacker Drive, Suite 3300 Chicago, IL 60606 Ph.: (312) 345-9600 Fax: (312) 345-9608 FEIN: 04-3674858

February 28, 2006

Ms. Pam Newton Delphi Corporation 5825 Delphi Drive Troy, MI 48098 Invoice# 10958 TJB Our file# 0059 0002

#### Delphi Overpayment/SSA Global

#### PROFESSIONAL SERVICES

02/01/2006 TJB	Review file received; run conflicts check; open file; dictate letter to Pam Newton.	1.20 hrs.	295.00 /hr.	354.00
02/09/2006 TJB	E-mails from and to Pam Newton	0.20 hrs.	295.00 /hr.	59.00
02/23/2006 TJB	Review correspondence received; call	0.30 hrs.	295.00 /hr.	88.50
	Stevens.			

**Total Fees For Professional Services** 

\$501.50

**Billing Summary** 

Total professional services

\$501.50

Total of new charges for this invoice

\$501.50

### **Timekeeper Summary**

Timekeepers/Hours Worked 01/01/2006 - 02/28/2006

Case: Delphi Overpayment/SSA Global

<u>Timekeeper</u>		<u>Hours</u>	Rate	Total
Burke, Thomas J.		1.70	295.00	\$501.50
	TOTALS:	1.70		\$501.50

# 

200 South Wacker Drive, Suite 3300 Chicago, IL 60606 Ph.: (312) 345-9600 Fax: (312) 345-9608 FEIN: 04-3674858

April 11, 2006

Ms. Pam Newton Delphi Corporation 5825 Delphi Drive Troy, MI 48098			e# 11274 e# 0059	TJB 0002
Delphi Overpayme	nt/SSA Global			
PROFESSIONAL S	ERVICES			
03/03/2006 JAS	Telephone call to client regarding status of case and plan for future handling.	0.10 hrs.	215.00 /hr.	21.50
03/09/2006 JAS	Research causes of action for fraud, breach of contract, conversion, negligent misrepresentation, and action for an accounting to determine most appropriate cause of action to file on behalf of client.	0.90 hrs.	215.00 /hr.	193.50
03/22/2006 EPS	Review factual pattern and develop theories of liability against defendant.	0.30 hrs.	185.00 /hr.	55.50
03/22/2006 JAS	Telephone call to client regarding strategy for handling case.	0.10 hrs.	215.00 /hr.	21.50
03/22/2006 JAS	Research "unjust enrichment" and "mistake of fact" as defenses; develop strategy for response to Defendant's refusal to refund double payment.	1.70 hrs.	215.00 /hr.	365.50
03/22/2006 TJB	Conference with Jane Stevens regarding complaint; e-mails from Jane Stevens.	0.30 hrs.	295.00 /hr.	88.50
03/24/2006 JAS	Telephone call with Pam Newton regarding initial plan of action.	0.20 hrs.	215.00 /hr.	43.00
03/25/2006 JAS	Draft correspondence to SSA Global requesting repayment of sum owed.	0.50 hrs.	215.00 /hr.	107.50
03/27/2006 JAS	Revise correspondence to SSA and draft correspondence to client enclosing draft of same for review and approval.	0.10 hrs.	215.00 /hr.	21.50
	<b>Total Fees For Professional S</b>	Services		\$918.00
DISBURSEMENTS 03/31/2006 Onlin	S ne research			38.29

05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 7 of 13

03/31/2006 Postage

0.50

**Total Reimbursable Costs** 

\$38.79

**Billing Summary** 

Total professional services

\$918.00

Total reimbursable costs

\$38.79

Total of new charges for this invoice

\$956.79

**Timekeeper Summary** 

Timekeepers/Hours Worked 01/01/2001 - 03/31/2006

Case: Delphi Overpayment/SSA Global

<u>Timekeeper</u>		<u>Hours</u>	Rate	<u>Total</u>
Burke, Thomas J.		0.30	295.00	\$88.50
Stevens, Jane A.		3.60	215.00	\$774.00
Schoonveld, Eric		0.30	185.00	\$55.50
,	TOTALS:	4.20		\$918.00

## 05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 8 of 13 Hall Prangle & Schoonveld, L.L.C.

200 South Wacker Drive, Suite 3300 Chicago, IL 60606 Ph.: (312) 345-9600 Fax: (312) 345-9608 FEIN: 04-3674858

June 19, 2006

Ms. Pam Newton Delphi Corporation 5825 Delphi Drive Troy, MI 48098			e# 12226 e# 0059	TJB 0002
Delphi Overpayme	ent/SSA Global			
PROFESSIONAL S	EERVICES			
04/17/2006 JAS	Telephone call to client regarding status of overpayment claim.	0.10 hrs.	215.00 /hr.	21.50
05/24/2006 JAS	Telephone call to Defendant regarding overpayment; draft correspondence to defendant regarding same; draft Counts I and II of Complaint (unjust enrichment and fraud); research conversion; research fraud; research negligent misrepresentation; research availability of Punitive damages in fraud action.	3.70 hrs.	215.00 /hr.	795.50
05/25/2006 JAS	Review correspondence received from Defendant; draft correspondence regarding same to client; review correspondence from client regarding plan for future handling.	0.20 hrs.	215.00 /hr.	43.00
	<b>Total Fees For Professional</b>	Services		\$860.00
DISBURSEMENTS 05/31/2006 Posta	devide the state of the state o			0.39
	<b>Total Reimbursable Costs</b>			\$0.39

05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 9 of  $13_{226}$ 

Billing Summary

0059

Total professional services

\$860.00

Total reimbursable costs

\$0.39

Total of new charges for this invoice

\$860.39

### **Timekeeper Summary**

Timekeepers/Hours Worked 01/01/2001 - 05/31/2006

Case: Delphi Overpayment/SSA Global

 Timekeeper
 Hours
 Rate
 Total

 Stevens, Jane A.
 4.00
 215.00
 \$860.00

 TOTALS:
 4.00
 \$860.00

# 05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Hall Prangle & Schoonveld, L.L.C.

200 South Wacker Drive, Suite 3300 Chicago, IL 60606 Ph.: (312) 345-9600 Fax: (312) 345-9608 FEIN: 04-3674858

July 18, 2006

Ms. Pam Newton Delphi Corporation 5825 Delphi Drive Troy, MI 48098		Invoice# 12788 Our file# 0059	8 TJB 0002
Delphi Overpayme	nt/SSA Global		
PROFESSIONAL S	ERVICES		
06/06/2006 JAS	Review correspondence from counsel for defendant; draft correspondence to client regarding same; draft correspondence to defendant in reply; review documents requested by defendant; prepare documents to provide to defendant.	1.40 hrs. 195.00	/hr. 273.00
06/07/2006 JAS	Review correspondence from Defendant regarding investigation; draft correspondence to client regarding contracts; draft correspondence to Defendant attaching cashed checks and bank statements.	0.40 hrs. 195.00	/hr. 78.00
06/14/2006 JAS	Review correspondence from defendant regarding contracts; draft correspondence to client regarding same.	0.10 hrs. 195.00	/hr. 19.50
06/22/2006 JAS	Review and analysis of documents received from defendant and correspondence explaining same; review correspondence received from client with respect to same; analysis of time line as proposed by defendant; draft correspondence to client; draft correspondence to defendant requesting additional information pertaining to check numbers corresponding to contracts.	1.30 hrs. 195.00	/hr. 253.50
06/26/2006 JAS	Review correspondence received from client; draft reply correspondence; review correspondence received from Defendant regarding "Addendum to Contract."	0.30 hrs. 195.00	/hr. 58.50

05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 11 of 1238 0002 0059 **Total Fees For Professional Services** \$682.50 **DISBURSEMENTS** Online research. 37.82 06/20/2006 Credit for rate change from \$215/hr to \$195/hr for Jane Stevens' time on (152.00)06/30/2006 invoice 11274 and 12226. (\$114.18)**Total Reimbursable Costs Billing Summary** Total professional services \$682.50 (\$114.18) Total reimbursable costs \$568.32 Total of new charges for this invoice **Timekeeper Summary** Timekeepers/Hours Worked 01/01/2001 - 06/30/2006 Case: Delphi Overpayment/SSA Global Hours Rate Total Timekeeper \$682.50 3.50 195.00 Stevens, Jane A. 3.50 \$682.50

TOTALS:

## 05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 12 of 13 Hall Prangle & Schoonveld, L.L.C.

200 South Wacker Drive, Suite 3300 Chicago, IL 60606 Ph.: (312) 345-9600 Fax: (312) 345-9608 FEIN: 04-3674858

August 14, 2006

Ms. Pam Newton Delphi Corporation 5825 Delphi Drive Troy, MI 48098			e# 13087 e# 0059	TJB 0002
Delphi Overpaymo	ent/SSA Global			
PROFESSIONAL S	SERVICES			
07/06/2006 JAS	Review correspondence from Defendant's counsel regarding contracts and payment on contract addendums.	0.10 hrs.	195.00 /hr.	19.50
07/11/2006 JAS	Telephone call with client regarding investigation into overpayment; review and analysis of lengthy correspondence from defendant regarding their investigation into overpayment.	0.40 hrs.	195.00 /hr.	78.00
07/13/2006 JAS	Draft correspondence to defendant regarding resolution of case.	0.30 hrs.	195.00 /hr.	58.50
	<b>Total Fees For Professiona</b>	al Services		\$156.00
DISBURSEMENT: 07/31/2006 Copy	recipion			12.15

**Total Reimbursable Costs** 

\$12.15

05-44481-rdd Doc 18939 Filed 09/25/09 Entered 09/28/09 15:33:04 Main Document Pg 13 of  $\frac{1}{150}$ 87

Billing Summary

0059

Total professional services \$156.00

Total reimbursable costs \$12.15

Total of new charges for this invoice \$168.15

### **Timekeeper Summary**

Timekeepers/Hours Worked 01/01/2001 - 07/31/2006

Case: Delphi Overpayment/SSA Global

<u>Timekeeper</u>		Hours	Rate	<u>Total</u>
Stevens, Jane A.		0.80	195.00	\$156.00
	TOTALS:	0.80		\$156.00